

AB:MWG

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 841)

HAO BO JIANG,

19-MJ-917

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

RAYAN HAMDAN, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration, duly appointed according to law and acting as such.

On or about October 8, 2019, within the Eastern District of New York and elsewhere, the defendant HAO BO JIANG did knowingly and intentionally manufacture, distribute, dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance, to wit, 100 kilograms or more of a substance containing marijuana, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B).

(Title 21, United States Code, Section 841)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Drug Enforcement Administration ("DEA") and have been involved in the investigation of numerous cases involving narcotics. In this capacity, I have participated in numerous narcotics investigations, including the execution of search warrants and narcotics seizures. I am familiar with the methods used to package and process controlled substances, including marijuana and ketamine. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. Law enforcement agents have been investigating HAO BO JIANG ("JIANG") and others for the distribution of narcotics in violation of 21 U.S.C. § 841.

3. As part of that investigation, on October 8, 2019, law enforcement agents conducted a "knock and talk" at a certain address in Flushing, Queens, where they had reason to believe that JIANG lives (the "Apartment"). Law enforcement agents knocked on the Apartment's front door, and JIANG opened it. Law enforcement agents announced that they were investigating criminal activity and asked for permission to enter the Apartment. JIANG gave law enforcement verbal consent to enter and search the Apartment.

4. Upon entering the Apartment, law enforcement agents immediately observed in plain view a money counter, rubber bands, small plastic bags, and a plastic heat

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

sealing machine. Based upon my training and experience, these items are commonly used as part of a narcotics distribution operation.

5. Law enforcement agents also found approximately two grams of a substance containing ketamine near the money counter in the Apartment. Law enforcement agents then asked JIANG if there was additional ketamine in the Apartment, and he responded, in sum and substance and in part, that more ketamine was in the refrigerator. Law enforcement agents opened the refrigerator and found a sealed plastic bag containing ketamine.

6. As part of their search of the Apartment, law enforcement agents also found several ledger books that appeared to reflect marijuana transactions. JIANG admitted, in sum and substance and in part, that these ledgers included records of JIANG's marijuana sales.

7. Also as part of their search of the Apartment, law enforcement observed U.S. mail addressed to the apartment immediately adjoining JIANG's apartment (the "Adjoining Apartment"). Agents asked JIANG why this mail was in his possession, and JIANG admitted, in sum and substance and in part, that the Adjoining Apartment was where he kept the marijuana. JIANG then gave law enforcement agents the key to the Adjoining Apartment and gave his verbal consent for law enforcement agents to search the Adjoining Apartment.

8. Law enforcement agents used the key provided by JIANG to open the front door of the Adjoining Apartment. Upon entering the Adjoining Apartment, law enforcement agents observed many boxes containing heat-sealed plastic bags of a green leafy substance that, based upon my training and experience, is marijuana. JIANG admitted, in

sum and substance and in part, that the heat-sealed plastic bags contained approximately 300 pounds (approximately 136 kilograms) of marijuana.

9. JIANG further explained, in sum and substance and in part, that he purchases marijuana for \$1,400 per pound and sells it for \$1,600 pound, and that he sells an average of 200 pounds of marijuana per month for a profit of approximately \$10,000 per month.

10. JIANG confirmed his consent to search both the Apartment and the Adjoining Apartment by signing a written waiver of rights and consent to search both premises.

11. Thereafter, law enforcement agents placed JIANG under arrest.

12. JIANG's native language in Cantonese Chinese. The above-mentioned written waiver of rights and consent form were written in both English and Chinese. In addition, a Cantonese-speaking law enforcement agent was present at the Apartment and Adjoining Apartment, and this law enforcement agent served as a translator for JIANG and translated law enforcement agents' statements from English to Cantonese, and JIANG's statements from Cantonese to English.

13. Law enforcement agents seized the ketamine and marijuana found in the Apartment and the Adjoining Apartment. The ketamine seized from the Apartment was determined to have a gross weight of 1.5 pounds (680.389 grams). The marijuana seized from the Adjoining Apartment was determined to have a gross weight of 360 pounds (163.293 kilograms).

WHEREFORE, your deponent respectfully requests that the defendant HAO  
BO JIANG be dealt with according to law.



RAYAN HAMDAN  
Special Agent, Drug Enforcement Administration

Sworn to before me this  
9<sup>th</sup> day of October, 2019



THE HONORABLE PEGGY KUO  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK